

Regulatory Submittal Part I - Work Plan

**Remediation and Deconstruction of
Fiterman Hall – 30 West Broadway
New York, New York**

Prepared for:

The Dormitory Authority of the State of New York
City University of New York

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- Attachment I: Variance Applications
- Attachment II: Logistics Plan
- Attachment III: Remediation Phasing Plan 1-A
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1.0 General

A project team headed by Pei Cobb Freed & Partners, Architects, LLP (PCF-P) has been retained by the Dormitory Authority of the State of New York (DASNY), and The City University of New York (CUNY) to prepare a Project Plan to conduct the environmental remediation and deconstruction of the Fiterman Hall Building located at 30 West Broadway, New York, NY (Fiterman Hall, the Building, or 30 West Broadway). The Building is a 15-story, 370,000 (SF) classroom building owned by DASNY and operated prior to 9/11 by CUNY/Borough of Manhattan Community College. The building was physically damaged by the collapse of 7 World Trade Center, and impacted by the environmental effects of the World Trade Center Collapse. The purpose of Regulatory Submittal Part I – Work Plan, is to provide an overview of the intended project approach to be considered and used in conjunction with the documents described in Section 2.0, following.

2.0 Related Documents

2.1 *Façade Characterization Report*

Airtek Environmental Corporation (Airtek) was retained by PCF-P, on behalf of DASNY/CUNY to conduct a characterization of the façade of the Fiterman Hall Building. This report was prepared to support specific project planning and execution decisions. The *Façade Characterization Report* is provided under separate cover.

2.2 *Environmental Characterization Report*

Airtek was retained by PCF-P on behalf of DASNY/CUNY to conduct an environmental characterization study of the Fiterman Hall Building. The *Environmental Characterization Report* is provided under separate cover.

2.3 *Regulatory Submittal Part II – Environmental Community Air Monitoring Program*

Prior to initiation of any decontamination/deconstruction operations, an environmental community air monitoring program (ECAMP) approved by the USEPA, and detailed in the related document, *Regulatory Submittal Part II- Environmental Community Air Monitoring Program*, will be established and operational. The Program will consist of daily air monitoring at four points on the perimeter of the project site. Community Monitoring will continue until building demolition is complete. A Quality Assurance Project Plan (QAPP) is included as Attachment D to the ECAMP.

2.4 *Regulatory Submittal Part III – Preliminary Health & Safety Plan*

A site-specific Preliminary HASP to be applied to all site remediation and deconstruction operations has been developed. The Preliminary HASP details requirements for access/egress and requirements for Personal Protective Equipment (PPE) for workers at the site. The Preliminary HASP is included as Part III of the submittal package. The Contractor awarded the contract for the Project will finalize the HASP as appropriate for the Contractor's operations.

2.5 *Regulatory Submittal Part IV – Waste Sampling & Management Plan*

A site-specific Waste Sampling & Management Plan (WSMP) to be applied to all waste operations for the site has been developed. The WSMP provides details on how, and by whom, waste determinations and categorizations will be made, and provides detail on sampling and analysis protocols. The WSMP is included as Part IV of the submittal package. A QAPP for the WSMP is included as Attachment D to the WSMP.

3.0 Environmental Regulatory Notifications

3.1 Asbestos Survey

To comply with New York State Department of Labor (NYS DOL) requirements for building demolition, Airtek has undertaken an asbestos survey intended to coordinate and complete previous survey work that has been conducted at the site. All previous documentation was reviewed and a site survey and bulk sampling were conducted. Based on this survey work, an inventory of in-place asbestos has been developed. The results of the survey are included in Appendix IV to the *Environmental Characterization Report*.

3.2 NYS DOL Notification

The NYS DOL is the primary jurisdiction for the Remediation Phase of the Project. As the remediation will constitute a "Large Project" according to Industrial Code Rule 56 (ICR 56), notification of the Remediation Phase will be made to the NYS Department of Labor.

3.3 NYS DOL Variance Applications

As required by the specifics of the Contractor's work plan, which is to be provided in the subsequent regulatory submittal, NYS DOL Variances will be solicited and will be included as Attachment I to the final version of *Regulatory Submittal Part I - Work Plan*.

3.4 NYC DEP Notification

Notification of the project will be made to the NYC DEP for the Remediation Phase. Jurisdiction for work practices and variances is under the NYS DOL.

3.5 USEPA Notification

Due the fact that the decontamination will constitute a ‘Large Asbestos Project’ according to EPA NESHAP, notification of the project will be made to the USEPA. A copy of the USEPA notification will be attached to the final version of the Project Work Plan. In addition, if it is determined that greater than 100 kg of Hazardous Waste is to be generated in any one month from this site, RCRA notification of USEPA will be required.

4.0 Utilities - General:

4.1 Electric

The building is presently fed with a temporary service consisting of 800 Amps, 120 / 208 VAC electric power off of a Con Edison meter located in a protective enclosure and shed situated at the northwest corner of the site. The power presently feeds a switch providing emergency power for emergency lighting, a single service elevator, and temporary light stringers. This current electrical service is insufficient for the needs of the remediation / deconstruction Contractor; therefore, additional power must be provided.

The mechanical engineering consultant assessed the projected electrical loads, and prepared drawings showing the scope of the required electrical work. Con Edison reviewed the load request and the drawings, and determined that its equipment located in a vault on Barclay Street can adequately meet this requirement. The Construction Manager will contract with a licensed electrical contractor for the reactivation of a portion of the original building system.

Con Edison recently inspected the transformer installation located in vaults on Barclay Street that originally fed the building, and determined that one of the three transformers in the vault is currently active and the remaining two can be reactivated. Prior to increasing the power to the building, Con Edison requires that the existing inactive electrical equipment be cleaned of dust and rust, and then tested by the licensed electrical contractor. This work is to be conducted under a re-opening of NYS DOL Variance 05-0919. Con Edison will then inspect the electrical equipment. Once accepted, Con Edison will direct the electrical contractor to disconnect the temporary service. Con Edison will then reactivate the additional transformers.

The licensed electrical contractor will activate power in the main building riser to the main distribution panel on each floor. All distribution throughout the floor will be inactive. Power to the passenger and freight elevator will be restored. The elevator equipment will be gross cleaned and restored to operation by a licensed elevator maintenance contractor.

The remediation/deconstruction Contractor will engage the services of its own licensed electrical Subcontractor, who will be responsible for tying into the panels for the purpose of providing lighting, operating HEPA filtration equipment, and electrically operated tools. The electrical Subcontractor will be responsible for the system through remediation and deconstruction, including obtaining the final disconnect notice from Con Edison.

4.2 Plumbing

Presently the personnel decontamination unit (decon) located at the northwest corner of the property is operated off of water fed from temporary clean water storage tanks, which are located adjacent to the decon.

The mechanical engineering consultant has prepared plans for providing a source of potable water for use by the remediation deconstruction contractor. A new waterline will be extended from a point in the cellar near the existing service entrance to a point above street level at the proposed location of the decon. The water will be used for cleaning and operation of the various personnel and waste decon facilities. Drinking water will be provided by a bottled water vending service.

The remediation deconstruction contractor will be responsible for extending water service up through the building for its own needs, and will remove the system and disconnect the service from the building.

4.3 HVAC

The HVAC system will not be operated at any time.

4.4 Fire Protection

The existing fire standpipe will be filled, pressure tested, and repaired to make it ready for use by the FDNY. The standpipe will be operated as a dry system with hose racks. In the event of an emergency, the FDNY would use a pumper truck connected to a street hydrant to deliver water through the standpipe.

4.5 Elevator Service

As detailed in Airtek's *Re-opening Request for Variance 05-0919, 11/14/05* it is the intent of the Project to utilize the Building elevators to execute the abatement and demolition removals. Upon completion of the work detailed in the Re-opening request, operational capability of the building elevator systems will have been tested, and specific engineering controls and monitoring will be conducted to allow the elevators to be run safely.

As described below, the piston effect of the elevators and their potential to expel interior air into the outside environment will be addressed through the installation of engineering controls, and the application of monitoring specific to this operation.

Engineering Controls: Elevator banks in the building currently vent pistoned air to the elevator machine rooms and then to the outside air through louvers. The forcing of air to the exterior of the building will be prevented by: 1) the installation of critical barriers (two layers 6-mil poly and plywood, caulked at the edges); 2) the opening of alternate vents at the top of the shafts to allow air to vent into the top floor of the building, and the installation of negative air filtration devices in that space to filter and control the vented air, 3); the reduction of elevator velocity to reduce the piston effect.

Monitoring: Air monitoring for asbestos (TEM) and Metals (NIOSH 7300) will be conducted on a daily basis at the exterior of the critical barriers for each elevator at the roof level. An airlock will be installed at the roof access point to allow a NYS Certified Asbestos Air Sample Technician to conduct monitoring. This testing will be in addition to the environmental community air monitoring described in the ECAMP.

5.0 Monitoring:

5.1 Personal Monitoring:

Each Contractor and Subcontractor accessing the site will conduct Personal Exposure Monitoring as required by OSHA. Requirements for monitoring will be established by each employer.

5.2 Work Area Monitoring:

Project monitoring and asbestos air sampling will be conducted throughout the Remediation Phase of the Project. Project Monitoring will be conducted in strict accordance with ICR 56, subsection 56-17 and any provisions set forth in the Variance Application. All sample analyses will be by TEM. Project air monitoring is further detailed in *Regulatory Submittal Part II – Environmental Community Air Monitoring Plan*.

5.3 Environmental Community Air Monitoring

Community Monitoring will be conducted as detailed in *Regulatory Submittal Part II – Environmental Community Air Monitoring Plan*.

6.0 Remediation Phase

6.1 Operation I – Clean Zone Decontamination & Clearance

The first operation to be conducted will be the decontamination and environmental clearance testing of three areas of the first floor of the Building. As illustrated in *Attachment III – Remediation Phasing Plan 1-A*, these areas include Clean Zones 1, 2 & 3. Clean Zone 1 is the northeast corner of the first floor, where site offices for project management (DASNY/PCF Team/Contractor) will be established. Clean Zone 2 will include the loading dock areas where decontamination units will be located and transport loading will be conducted. At the request of the Regulators, Clean Zone 3 will be created to house the regulated waste storage areas so that these areas may be inspected by the Regulators without requiring entry to contaminated spaces. These areas will be sealed-off from the rest of the Building, gut-stripped and decontaminated, and then subjected to clearance testing as detailed in Section 7.0 below. Daily monitoring for asbestos will be conducted to verify the effectiveness of the engineering controls established to prevent re-contamination of the Clean Zones.

6.2 Operation II – Exterior Cleaning

As detailed in the *Façade Characterization Report*, the exterior of the building was decontaminated as a part of the NYC DEP Building Exterior Cleaning Program following 9/11/01. Limited exterior cleaning is still required at specific points noted during the characterization study, and on the lower two floors where urban background road dust has built up on the façade components. Focused exterior cleaning will be conducted by wet wiping and HEPA-vacuuming of the impacted façade components, using methods intended to prevent fugitive cleaning water. Exterior cleaning of the lower sections of the building will be conducted at the start of the project, and areas requiring scaffolding for cleaning operations will be cleaned as the scaffolding is erected. This work may overlap Operation III - the interior gut strip discussed below.

6.3 Operation III - Gut Strip

6.3.1 Building Envelope Preparation Work

The Gut-Strip will be conducted in negative air full-containment as an asbestos project according to the asbestos rules and NYC DOL Variance for the project. As detailed in the *Façade Characterization Report*, the façade of the building is in good condition. The interior surface of operable windows within the ribbon window system of the building will be HEPA vacuumed, wet wiped and sealed with two layers of 6-mil polyethylene sheeting, spray-glue and duct tape (NYS DOL Critical Barrier). The operable portions (frames, hinges, wells) of these windows will be cleaned during the scaffold erection (Section 7.3), and the plastic and duct tape will be removed at that time. In the “Gash Area” of the south

side of the Building, the exposed slabs and decks will be subject to HEPA vacuuming and wet-wiping, and new critical barrier walls (caulked stud & plywood walls, plus two layers of 6-mil polyethylene sheeting) will be established outboard of the existing temporary barrier walls. All exterior doors that are not to be used as Clean Zone entryways, or decontamination unit access/egress points will be locked and have critical barriers installed.

6.3.2 Establishment of Negative Air Pressure

Upon completion of the building envelope preparation, negative air pressure will be established in any area of the Building where work is to be conducted. Due to the large volume of the anticipated work areas, a NYS DOL Variance will be solicited to allow the use of smoke testing to verify negative pressure as opposed to manometer readings.

6.3.3 Material Shredder

In the south quadrant of the second floor (see *Attachment IV – Remediation Phasing Plan I-B*) a penetration will be cut in the floor to allow the installation of a material shredder that will be used to reduce and package Gut-Strip building debris. The shredder will produce packaged debris that will then be processed through the decontamination units prior to loading for transport and disposal as asbestos at a minimum.

6.3.4 Work Areas

The entire structure will be established as one containment area. Negative air pressure micro-traps and exhaust manifolds will be established on each floor.

6.3.5 Removals

All interior materials, including moveable objects, will be subject to abatement and removal. They will be bagged and/or processed through the material shredder and disposed of as ACM waste at a minimum. Certain non-porous fixtures and other impermeable materials may be decontaminated by HEPA-vacuum and wet wiping. Efficacy of this decontamination will be determined by the Environmental Consultant as described in the WSMP (Submittal Part IV). All ceiling systems (plaster, tiles, sheetrock, etc.), wall systems (plaster, wall board, etc.), and floor systems, (tiles, carpet, etc.) will be removed and bagged or shredded for disposal as ACM waste at a minimum. Waste characterization testing as described in the WSMP will be used to make final waste determinations. All interstitial spaces (i.e., chases, shafts, wet columns, etc.) will be accessed, wet-wiped, and HEPA-vacuumed. Remaining structural members will be wet-wiped, HEPA vacuumed.

6.4 Operation IV - In Place ACM:

In-place ACM has been identified as follows:

- Flooring materials
- Interior Façade Vapor Barrier
- Stair Bulkhead Window Caulk
- Spandrel Flashing

Per the requirements of the NYSDOL, these materials will be abated last in the decontamination sequence. As such, care will be taken to protect these materials from disturbance and/or damage during the gut-strip phase. ACM pipe insulation, if encountered, will be removed by NYS DOL Glovebag Procedures. For detailed information on the asbestos survey conducted, please refer to the *Environmental Characterization Report*, submitted under separate cover.

Flooring Materials:

Many areas of the Building have multiple layers of hard floor covering, including vinyl-asbestos floor tile. As all Remediation Phase gut-strip activities will be conducted in full-containment, for purposes of this project all hard floor covering materials will be treated as ACM and abated as a part of Operation IV - In-Place ACM.

Interior Façade Vapor Barrier:

The interior of the building façade, below the ribbon window system and behind the perimeter HVAC convector units, is coated with an ACM mastic vapor barrier. This material will be abated during the gut-strip operation of the Remediation Phase.

Stair Bulkhead Window Caulk:

Stair bulkheads at the roof level have older windows that contain ACM caulk. This material will be abated under a NYS DOL Variance at the commencement of the Deconstruction Phase.

Roof Membrane:

ACM roofing has been identified in one isolated location of the 14th floor setback roof. All other roofing and flashing materials have been confirmed non-ACM. This one section of roof will be abated as ACM at the commencement of the Deconstruction Phase.

Spandrel Flashing:

Asbestos-containing spandrel beam flashing exists that can only be abated as a part of the masonry façade deconstruction during the Deconstruction Phase of the Project. This is a non-friable material that will be removed in strict accordance with a site-specific NYS DOL Variance. Work area monitoring for asbestos will be conducted during the removal of this material, and community air monitoring will be ongoing.

6.5 Operation V - Remediation Work Area Cleanings

After completion of abatement and removal of all interior In-Place ACM, abatement work area cleanings per ICR-56 will be conducted. Following 2nd and 3rd cleanings and the settling periods, final air testing will be conducted as detailed in Section 6.6 below. Failure of clearance testing will result in re-cleaning of the work area tested, and re-testing. Upon successful clearance air testing, the work area will be encapsulated.

6.6 Operation VI – Work Area Clearance

The site will be considered ready for the conventional Deconstruction Phase when the building, is visually clean of all dust, when interior air clearance testing indicates that concentrations of the analytes listed below have been reduced to levels specified below, and when all remaining structural members have been encapsulated with a colored encapsulant,. All visual clearance and air testing will be conducted by the Owner’s Environmental Consultant. Where necessary a “White Glove Test” will be performed to determine visual clearance.

The building, or portions thereof, can be removed from containment and the Remediation Phase will be complete when area air measurements, performed using aggressive air sampling procedures which re-suspend residual settled dusts, are at or below each of the following airborne concentrations in every sample, respectively, for the metals noted below and for asbestos. Air testing for asbestos shall be in accordance with applicable regulations and applicable permits and variances for this project. If any one sample is above any of these limits, then the Remediation Phase will be considered incomplete, and the effected areas shall be re-cleaned and re-tested until the airborne concentrations are at or below the levels noted for metals and asbestos.

Clearance testing will be conducted by floor, or by isolated area, and will be acceptable when all samples for a given floor area meet the 70 structures per square millimeter TEM standard. Clearance testing for metals will be acceptable when all samples meet the following criteria:

Antimony	250 ug/m3
Barium	250 ug/m3
Beryllium	1.0 ug/m3

Cadmium	5.0 ug/m3
Chromium (III)	250 ug/m3
Copper	500 ug/m3
Lead	25 ug/m3
Manganese	100 ug/m3
Mercury	12.5 ug/m3
Nickel	50 ug/m3
Zinc	1,000 ug/m3

A detailed work area clearance protocol will be developed in conjunction with the Final Work Plan to be submitted by the Contractor. All samples will be collected using aggressive sampling techniques in compliance with Title 15 clearance sampling criteria. Details on sampling methodologies are included in Part II – ECAMP.

6.7 Operation VI - Encapsulation

Structural components remaining on completion of the Remediation Phase and clearance testing will be encapsulated with penetrating encapsulant.

7.0 Conventional Building Demolition:

Prior to commencement of conventional demolition, the remaining building components (anticipated to be principally concrete, steel, and masonry façade) will be tested by the Environmental Consultant for ACM content and RCRA characteristics, as noted in the WSMP. These materials will be handled and disposed of as appropriate based on the test results.

7.1 Permits:

Contractor will obtain all governmental permits necessary to perform the work including, but not limited to sidewalk bridges, D.O.T., etc. The contractor will obtain MTA, USEPA, LMCCC and other Regulator's approvals of the deconstruction plan and must secure a DOB demolition permit prior to the start of demolition. Second and third shifts may be instituted as allowed by Regulators and as required to complete the work on schedule. The contractor will secure regulatory approvals for extra shifts where required.

Contractor will comply with requirements of all city, state or federal agencies (including OSHA) relating to the demolition work.

7.2 Dust Suppression:

The Contractor will be responsible to take precautions to prevent fugitive dust from escaping the site. As noted in the Project HASP, the Contractor has the responsibility to monitor for visible emissions. Dust suppression engineering

controls will be the responsibility of the Contractor, and may include, but not be limited to the following:

- Wet suppression: The use of water and/or amended water
- Site housekeeping via vacuuming/sweeping
- Limitation of free-fall of demolition debris
- Limitation of freefall during waste loading
- Sealed and/or covered transport

The listed controls are intended as a guideline. It is the responsibility of the Contractor to implement whatever engineering control is required (whether above-listed or not) to prevent fugitive dust.

Failure to suppress dust that results in visible fugitive emissions from the site will result in a work stoppage. Work will not be re-started until adequate corrective measures have been implemented to the satisfaction of the Site Hygienist, and the USEPA/Regulators. The procedures to be followed with regards to visible emissions are specified in the ECAMP (Part II of the Submittal).

7.3 Scaffolding

In preparation for demolition and at a time when exterior façade focused wiping and operable window panel cleaning is performed on floors higher than the first floor, a code approved demolition scaffold, netting, sidewalk shed and construction fence must be installed per the site logistics plan. All required permits for sheds, scaffold, hoists, lane closings, etc. will be obtained and renewed by the contractor. Scaffold ties to the building may not be fastened to the brick veneer, but must be fastened to steel spandrels to achieve the required anchoring strength and so as not to break the building containment envelope. Any penetration through the ACM Spandrel Flashing must be conducted under a NYS DOL Variance in strict accordance with the asbestos/CoPC control procedure detailed in the structural engineer's *Deconstruction and Scaffold Layout Plan*. A scaffold tie may be installed through the exterior façade to an area inside the building under a NYS DOL Variance in strict accordance with the asbestos/CoPC control procedures described in the structural engineer's *Deconstruction and Scaffold Layout Plan*.

7.4 Site Protection:

The Contractor will be responsible for all temporary protection to any adjacent buildings and/or lots. The Contractor will include roof top protection, sidewalk bridges as required to perform this work.

The Contractor will maintain the project site, adjacent sidewalks and streets free from debris and garbage, including daily sweeping of sidewalks for the duration of the contractor's work.

The Contractor will provide and maintain a plywood fence along all sides of the property. All work to be coordinated with NYC Department of Buildings (NYC DOB) temporary fence permit. Upon completion of the Contractor's work, the fence and gates will be left in an acceptable condition, with gates in locations approved by, and coordinated with, the General Contractor. General Contractor will obtain fence permit(s) and maintain permit(s) for the duration of the project. Fence will comply with NYC DOB requirements and will be constructed of minimum 5/8" exterior grade plywood on two by four frames. Fence will be painted Dark Blue and will have "Post No Bills" painted a maximum of 10 feet on center. Fence will be constructed with wood or metal posts at regular intervals. Post will be sunk into the ground as required to make them free standing without bracing or outriggers. Fence will be constructed such that sections of it are easily removable without disturbing remaining sections. Blind spots will not be created on sidewalk.

7.5 Demolition Sequence:

Once the entire building is removed from containment, the contractor will decommission the elevators, disconnect all utilities to the site, obtain a demolition permit and remove the windows. If an outside hoist that has been used for remediation is not left in place as a Fire Department readiness hoist or when the contractor has decommissioned the interior elevators, the contractor will install an outside Fire Department readiness hoist in the location designated on the site logistics plan, with openings at floors as mandated by the FD. The hoist can be used as a personnel hoist to get demolition workers to the upper floors. The contractor will deconstruct the building in the sequence described in their work plan, keeping dust to a minimum through the use of water spray and tarps. As each floor is deconstructed, material will be pushed down abandoned shafts and dropped to the cellar level, where backhoes and loaders will move it onto trucks parked on a ramp that runs from the cellar to street level on Greenwich Street. The material will then be carted to waste sites or recycling plants.

7.6 Waste Management – Conventional Demolition:

Conventional demolition will involve only the remaining structural components and masonry exterior of the building, and the non-friable asbestos spandrel flashing. As detailed in the WMP (submittal Part IV), representative waste will be collected by the Environmental Consultant for analysis by Full TCLP and RCRA characteristics. Based on the results of TCLP testing, the waste will be characterized according to any RCRA exceedances. Disposal will be only to facilities licensed to accept the waste so characterized.

Transportation and Disposal will be as described in Part IV of the Submittal, "Waste Sampling & Management Plan" Sections 9, 10 & 11. Records of

hazardous waste determinations and hazardous waste manifests will be retained for a period of at least three years from the completion of the project.

7.7 Site Work:

The Contractor will perform proper dust control during any demolition or removal work. The procedures to be followed with regards to visible emissions are specified in the ECAMP.

The Contractor will comply with all federal and local laws regarding noise control.

All work will be done by appropriately qualified labor. The Contractor will be responsible for employing qualified tradesmen for the duration of the Contractor's contract work on this project.

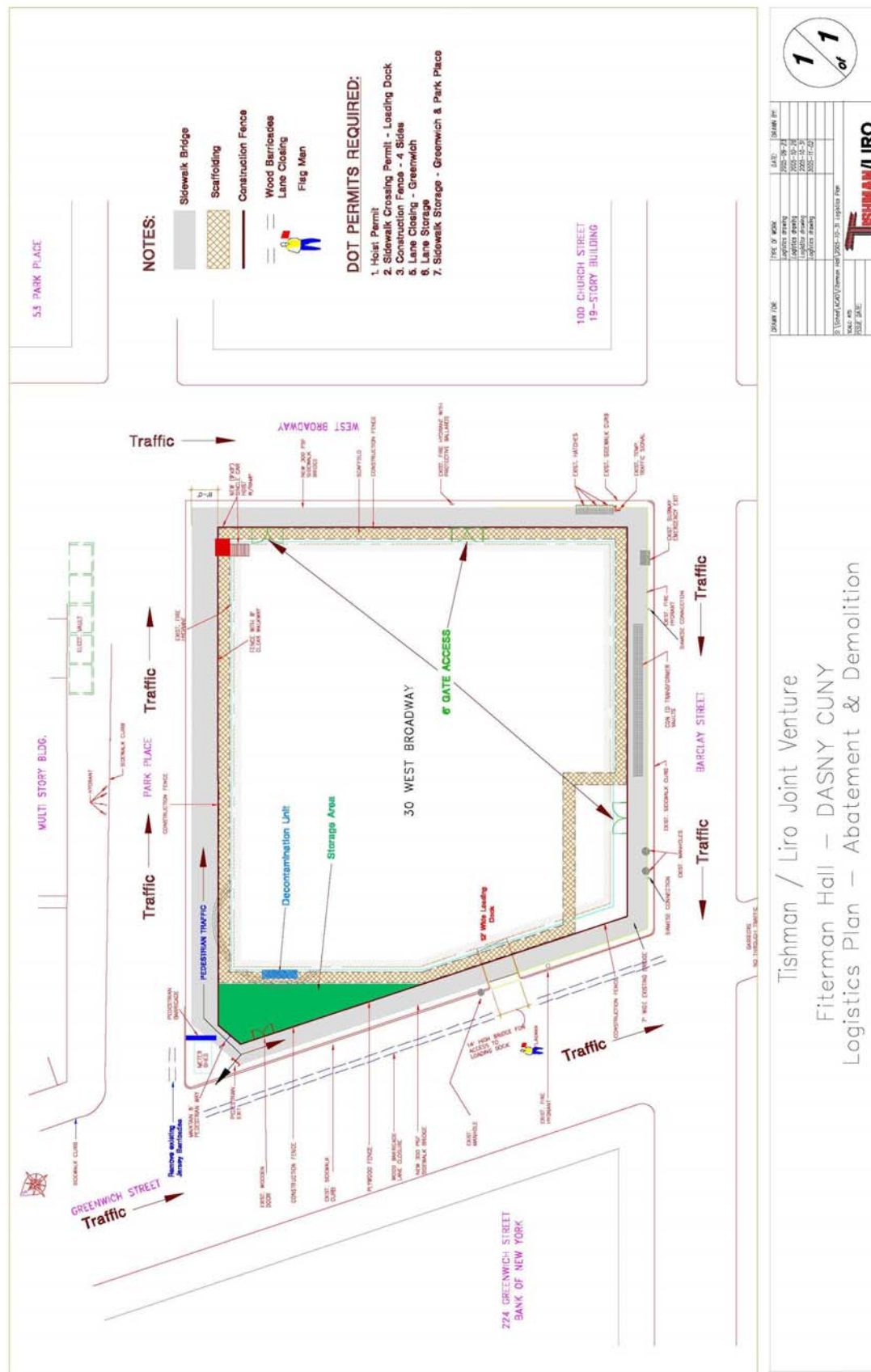
Once the building is demolished, the contractor will leave a clean site with the required construction fence in place. Any rubble in the cellar is to be removed and the cellar concrete slab is to be left broom clean. Foundation wall bracing is to remain in place. All demolition scaffolding will be removed from the site.

All work is to be performed in accordance with the latest standards as established by OSHA.

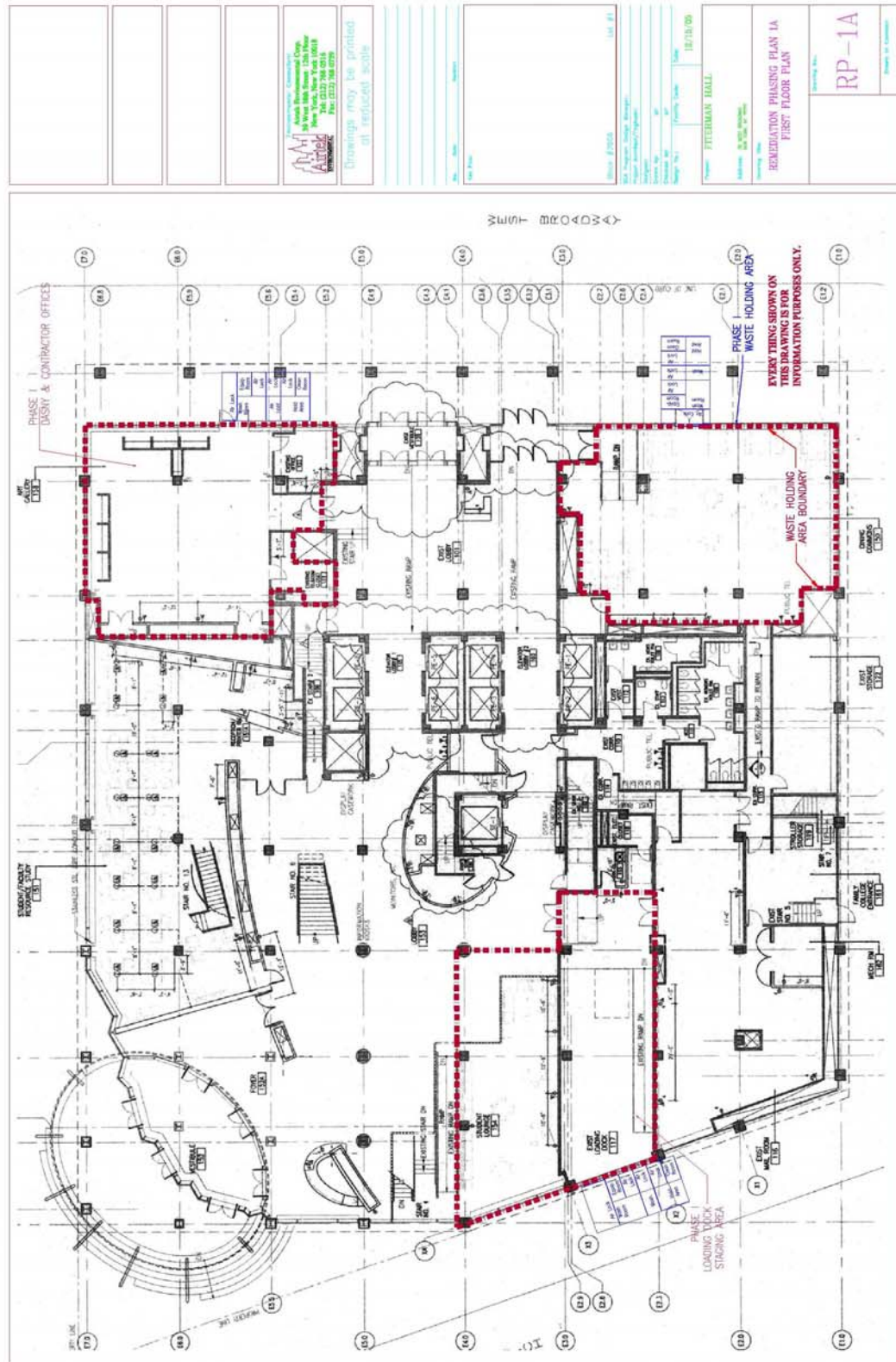
Attachment I: Variance Applications

(Regulatory Variances to be Determined by Final Contractor Scope)

Attachment II: Logistics Plan



Attachment III: Remediation Phasing Plan 1-A



Attachment IV: Remediation Phasing Plan 1-B

